#### **REMARKS**

In the Office Action,<sup>1</sup> the Examiner objected to claims 12 because of informalities; rejected claims 1-10, 12-16, 18-22, 24, 25, 28, and 29 under 35 U.S.C. §101 as being directed to non-statutory subject matter; rejected claims 1, 3-10, 12-16, 18-22, 24, 25, 28, and 29 under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2003/0004874 to Ludwig et al. ("Ludwig"); and rejected claim 2 under 35 U.S.C. §103(a) as being anticipated by Ludwig in view of U.S. Publication No. 2004/0215572 to Uehara et al. ("Uehara").

Applicants thank the Examiner for conducting a telephonic interview on April 4, 2007. By this Amendment, Applicants cancel claims 2, 9, 15, and 21 (claims 11, 17, 23, 26, and 27 being previously cancelled), and amend claims 1, 3-8, 10, 12, 14, 16, 18, 20, 22, 24, 25, and 28. The rejection of claim 2 under 35 U.S.C. § 103(a) is rendered moot by the cancellation of claim 2. Claims 1, 3-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 remain pending.

### I. Objection to Claim 12

The Examiner objected to claim 12 because claim 12 depends from claim 12. In response, Applicants correct this typographical error such that claim 12 now properly depends from claim 8. Accordingly, Applicants respectfully request that the Examiner withdraw this objection.

<sup>&</sup>lt;sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

## II. Rejection of Claims 1-10, 12-16, 18-22, 24, 25, 28, and 29 under 35 U.S.C. § 101

Applicants respectfully traverse the rejection of claims 1-10, 12-16, 18-22, 24, 25, 28, and 29 under 35 U.S.C. § 101 as being directed to non-statutory subject matter.

The Examiner states, "Applicant is suggested to amend the claims to recite 'computer readable storage medium' to overcome the 101 rejection." Office Action, page 3.

Although Applicants do not necessarily agree that such claim amendments are necessary, to advance prosecution, Applicants have amended claims 1, 3-8, 20, 22, 24, and 25 as the Examiner suggested.

Furthermore, the Examiner states, "the claims do not recite a practical application by . . . producing a useful, concrete, and tangible results" because "[i]t is unclear what result is being produced after calling the workflow." See Office Action, page 3.

Applicants disagree. Each of the claims relate to the starting of a "state dependent workflow" based on the current state of the processing of the invoice (see independent claims 1, 8, 14, and 20). A "workflow" may be designed, for example, to solve a specific problem or initiate a specific process (such as a dispute process) related to the invoice. See Specification, p. 9, para. 029. Such a state dependent workflow is useful, concrete, and tangible. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the § 101 rejection.

# Rejection of Claims 1, 3-10, 12-16, 18-22, 24, 25, 28, and 29 under § 102(e) Applicants respectfully traverse the rejection of claims 1, 3-10, 12-16, 18-22, 24, 25, 28, and 29 under 35 U.S.C. § 102(e) as being anticipated by Ludwig. In order to

properly establish that <u>Ludwig</u> anticipates Applicants' claimed invention under § 102, each and every element of each of the claims must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." *See* M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Applicants submit that <u>Ludwig</u> does not disclose each and every element of Applicants' claimed invention.

Independent claim 1 recites a combination including, for example, "the data field has a link to a state value table comprising the current state." The Examiner appears to allege that this feature of the claimed invention is taught in paragraph 0092 of <a href="Ludwig">Ludwig</a>. Office Action, page 6. Applicants respectfully disagree. <a href="Ludwig">Ludwig</a> teaches that "the system may display all invoices in table format. . . . [T]he system may display . . . payer name, invoice number, due date, status," etc. <a href="Ludwig">Ludwig</a> further teaches that "[t]he system may link the status field to the invoice history page." See <a href="Ludwig">Ludwig</a>, para. 0092.

According to <a href="Ludwig">Ludwig</a>, therefore, the invoice, displayed in table format, includes a status. However, the status field in that table contains the status, not a link to a "state value table." Furthermore, the link in the status field of <a href="Ludwig">Ludwig</a> is a link to an invoice <a href="history">history</a> page, not a link to a table comprising the "current state." Therefore, <a href="Ludwig">Ludwig</a> does not teach or suggest all element of the claim, including that "the data field has a link to a state value table comprising the current state," as recited in claim 1.

For at least the reasons stated above, <u>Ludwig</u> fails to anticipate claim 1. In addition, independent claims 8, 14, and 20, although different in scope from claim 1,

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recite features similar to claim 1. Therefore, claims 8, 14, and 20 are also not anticipated by <u>Ludwig</u> for at least reasons similar to those set forth above with respect to claim 1. Dependent claims 3-7, 10, 12, 13, 16, 18, 19, 22, 24, 25, 28, and 29 are also allowable over <u>Ludwig</u> at least by virtue of their dependence from allowable base claims 1, 8, 14, and 20. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1, 3-10, 12-16, 18-22, 24, 25, 28, and 29 under 35 U.S.C. § 102(e) as being anticipated by Ludwig.

## **CONCLUSION**

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

By:

Respectfully submitted,

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Dated: April 12, 2007

C. Gregory Gramenopoulos

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